

Scott Freeman MD et al. v. Stephen Hurst et al.

2:22-cv-01433-RFB-MDC

Stipulation and Order to Extend Briefing Schedule – Fourth Request

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10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 SCOTT FREEMAN MD, individually and as trustee
for THE SCOTT MITCHELL FREEMAN
13 REVOCABLE LIVING TRUST, DATED MARCH 10,
2012, for itself and as assignee of FERDINAND
14 BELGA,

15 Plaintiff,

16 *v.*

17 STEPHEN HURST; NICO FORTE; CERUVIA
LIFESCIENCES f/k/a CH TAC, LLC f/k/a
18 SAVANT TAC, LLC; CAREY TURNBULL;
19 RUSSELL BURBANK; BPM LLP; SAVANT HWP,
INC.; SAVANT HWP HOLDINGS, LLC; and
20 SAVANT ADDICTION MEDICINE, LLC,

21 Defendants,

22 *and*

23 SAVANT ADDICTION MEDICINE, LLC;
SAVANT HWP HOLDINGS, LLC; and SAVANT
24 HWP, INC.,

25 Nominal Defendants.

Case No. 2:22-cv-1433-RFB-MDC

**Stipulation and Order to Extend
Briefing Schedules – Fourth
Request**

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1 **WHEREAS**, on three occasions, the Court previously extended the time to the
2 below pleadings, as well as entered a temporary stay of discovery, in light of the Parties'
3 settlement negotiations. *See* ECF Nos. 208, 217, 221.

4 **WHEREAS**, the undersigned parties are engaged in active settlement negotiations
5 to fully resolve all claims and defenses and desire to conserve resources during said
6 negotiations.

7 **WHEREAS**, Plaintiff and Defendant Hurst have agreed upon a framework for a
8 settlement, which will involve a global release of all claims in this action. To finalize these
9 settlement negotiations, the Parties have agreed to extend the stay of discovery (pending
10 Court approval) by an additional three months, and the Parties similarly wish to continue
11 conserving resources related to the below briefing schedule for the same reasons. The
12 Parties request three months to accommodate the following: drafting and finalizing the
13 written settlement agreement with all Parties; scheduling all necessary
14 shareholder/member votes to approve said agreement; holding all necessary
15 shareholder/member votes; and, if approved, moving the Court for approval of the Parties'
16 good faith settlement agreement.

17 The undersigned parties therefore present the following proposed schedule.
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1 **IT IS HEREBY STIPULATED AND AGREED**, by and between the
 2 undersigned parties, by and through their respective counsel of record, that they will adhere
 3 to the revised briefing schedule set forth below:

4 Event	Current Date (ECF No. 221)	New Date
5 Temporary Stay of 6 Discovery	Nov. 18, 2024	Tuesday, February 18, 2025
7 Answer or Response to 8 Third Amended 9 Complaint for Savant LLCs	Nov. 18, 2024	Tuesday, February 18, 2025
10 Reply in Support of 11 Motion to Disqualify ¹	Nov. 18, 2024	Tuesday, February 18, 2025
12 Opposition to Nico Forte's Motion to Dismiss	Nov. 18, 2024	Tuesday, February 18, 2025
13 Opposition to Ceruvia 14 and Turnbull's Motion to Dismiss	Nov. 18, 2024	Tuesday, February 18, 2025
15 Response, Answer, 16 and/or other Motions related to Hurst's 17 Counterclaim	Nov. 29, 2024	Friday, February 28, 2025

18 **IT IS FURTHER STIPULATED AND AGREED**, by and between the
 19 undersigned parties, and through their respective counsel of record, that any reply briefs
 20 associated with the extended deadlines not addressed above will be filed on or before March
 21 4, 2025.

22
 23
 24 ¹ Plaintiff intends to file his Opposition to the Motion to Disqualify (ECF No. 201) by the
 25 current deadline, November 18, 2024. However, the Parties agree that any associated reply
 brief need not be filed until the extended deadline, pending Court approval.

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Respectfully submitted this 15th day of November 2024.

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ORDER

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE/
UNITED STATES MAGISTRATE
JUDGE

Dated: 11/18/24

Case No.: 2:22-cv-01433-RFB-MDC

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of November 2024, a true and correct copy of the foregoing **STIPULATION AND ORDER TO EXTEND BRIEFING SCHEDULES - FOURTH REQUEST** was served by the following method(s):

- ☒ **Electronic:** by submitting electronically for filing and/or service with the United States District Court District of Nevada's e-filing system and served on counsel electronically in accordance with the E-service list to the following email addresses:

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